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COMMISSION
OFFICE OF GENERAL
COUNSEL

2009 JAN -5 P 12:09

December 23, 2008

Federal Election Commission
General Counsel's Office
Washington D.C. 20463
Attention: Mr. Jeff S. Jordan

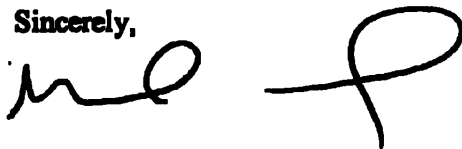
RE: MUR 6140

Dear Mr. Jordan:

We are in receipt of your letter dated December 9, 2008 regarding a complaint filed with the Commission against Mr. Bill Dew and the Bill Dew for Congress Campaign Committee. The complaint suggests that the Committee and myself as treasurer may have violated the Federal Election Campaign Act of 1971, as amended by allowing the committee to purchase clothing for the candidate with campaign funds.

As Treasurer of the campaign, I have reviewed the complaint and the related election regulations. I have again discussed the matter with Bill Dew. While the clothing purchase was a necessary campaign expenditure and for a specific campaign event, it did in fact violate the definitions of contributions and personal use conversions as outlined in the act. Accordingly, Bill has agreed to refund the campaign in the amount of \$1,089.16. We will show the refunded amount in our year end report.

Sincerely,



Mike McCauley, CPA
Treasurer

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